



Kent A. Yalowitz
+1 212.836.8344 Direct
Kent.Yalowitz@arnoldporter.com

January 14, 2022

BY ECF

Hon. George B. Daniels
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sokolow et al. v. Palestine Liberation Organization et al.*
No. 04 Civ. 397 (GBD) — Supplemental Memorandum

Dear Judge Daniels:

Plaintiffs respectfully seek permission to submit the enclosed supplemental memorandum concerning the constitutionality of the PSJVT. In particular, the memorandum discusses Judge Furman's decision in *Fuld v. PLO*, No. 20 Civ. 3374 (JMF) (Jan. 6, 2021), which held the statute unconstitutional.

We hope that this memorandum will be of assistance to the Court.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "Kent A. Yalowitz".

Kent A. Yalowitz

Encl.
cc: ECF Counsel